

EXHIBIT C

From: Ryan Gorman
Sent: Tuesday, April 22, 2025 2:20 PM
To: Russo, Amanda; Kanny, Matthew P; Thompson, Aaron; Daniel Bergeson; Rebecca Kaufman; Jaideep Venkatesan; Adam Trigg; Fondo, Grant P
Cc: QE-Swan
Subject: RE: Swan/Proton - Notices of Subpoena

Mandy,

We understand that Defendants have requested the production of documents received from third-party subpoena recipients. We agree that such discovery request is not overbroad or irrelevant and thus will agree to produce documents to Defendants in response to that request. Swan will provide Defendants with copies of any documents it receives in response to the third-party subpoenas, after entry of a protective order that reflects Magistrate Judge Eick's yesterday ruling (Dkt. 171). Please also confirm that this agreement is mutual and that Defendants will similarly produce to Swan any documents produced by third-party subpoena recipients.

Please also confirm whether you have already received document productions or a preview of document productions from any third-party subpoena recipients such that Swan's production of that material would be duplicative. Defendants' objections to Swan's document requests that seek production of Defendants' communications with subpoena recipients do not identify if any documents exist that are being withheld, in violation of Federal Rule of Civil Procedure 34(b)(2)(C). Those RFPs are targeted requests for communications that you are already aware of—to the extent they exist. Please confirm by 5pm PT tomorrow whether you have communicated with any third-party subpoena recipients regarding the subpoenas or responses thereto and are withholding such communications.

Thanks,

Ryan Gorman

Associate

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Russo, Amanda <ARusso@goodwinlaw.com>
Sent: Monday, April 14, 2025 6:26 PM
To: Kanny, Matthew P <MKanny@goodwinlaw.com>; Ryan Gorman <ryangorman@quinnemanuel.com>; Thompson, Aaron <AThompson@goodwinlaw.com>; Daniel Bergeson <dbergeson@be-law.com>; Rebecca Kaufman <rkaufman@be-law.com>; Jaideep Venkatesan <jvenkatesan@be-law.com>; Adam Trigg <atrigg@be-law.com>; Fondo, Grant P <GFondo@goodwinlaw.com>

[EXTERNAL EMAIL from arusso@goodwinlaw.com]

Counsel,

We are following up on our request of April 1 regarding any documents received in response to the third-party subpoenas you have issued in this case. We have received no response from you. Please confirm that you will be providing any such documents and that we can expect them in short order.

Thanks,
Mandy

Amanda H. Russo



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ARusso@goodwinlaw.com



From: Kanny, Matthew P <MKanny@goodwinlaw.com>

Sent: Tuesday, April 1, 2025 7:18 AM

To: Ryan Gorman <ryangorman@quinnemanuel.com>; Thompson, Aaron <AThompson@goodwinlaw.com>; Russo, Amanda <ARusso@goodwinlaw.com>; Daniel Bergeson <dbergeson@be-law.com>; Rebecca Kaufman <rkaufman@be-law.com>; Jaideep Venkatesan <jvenkatesan@be-law.com>; Adam Trigg <atrigg@be-law.com>; Fondo, Grant P <GFondo@goodwinlaw.com>

Cc: QE-Swan <qe-swan@quinnemanuel.com>

Subject: RE: Swan/Proton - Notices of Subpoena

Counsel: We hereby request a copy of any production of documents you receive in response to the third-party subpoenas you have issued in connection with this matter. Please produce any such documents as soon as possible. Thank you.

From: Ryan Gorman <ryangorman@quinnemanuel.com>

Sent: Wednesday, March 26, 2025 9:38 AM

To: Kanny, Matthew P <MKanny@goodwinlaw.com>; Thompson, Aaron <AThompson@goodwinlaw.com>; Russo, Amanda <ARusso@goodwinlaw.com>; Daniel Bergeson <dbergeson@be-law.com>; Rebecca Kaufman <rkaufman@be-law.com>; Jaideep Venkatesan <jvenkatesan@be-law.com>; Adam Trigg <atrigg@be-law.com>; Fondo, Grant P <GFondo@goodwinlaw.com>

Cc: QE-Swan <qe-swan@quinnemanuel.com>

Subject: Swan/Proton - Notices of Subpoena

EXTERNAL

Counsel,

Pursuant to Federal Rule of Civil Procedure 45(a)(4), please see the attached Notices of Subpoena.

Thanks,

Ryan Gorman

Associate

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